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**Aromatic Sulfonic Acids Association**

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May 20, 2004

Dr. Oscar Hernandez, Director  
Risk Assessment Division  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Re: ASAA Revised Test Plan for Benzenesulfonic Acid (CAS No 98-11-3) Under the HPV Program.

Dear Dr. Hernandez;

On September 16, 2003, the Aromatic Sulfonic Acids Association (ASAA) submitted a test plan and robust summaries (in IUCLID format) for benzenesulfonic acid (BSA) (CAS No. 98-11-3). On March 2, 2004, the ASAA received comments from EPA regarding the test plan and summaries. The ASAA thanks the EPA and several public commenters for thoughtful suggestions, which we believe have strengthened our test plan.

The ASAA has revised the test plan and robust summaries as follows:

Introduction – The HPV Assessment Introduction was revised to include synonyms and additional detail on uses of BSA.

Physicochemical properties – An estimation of the vapor pressure has been performed with the Watson correlation from the measured boiling point at 171-172° C. The testing guideline (OECD 104) permits this approach if the vapor pressure is lower than 10 Pa. The same guideline also provides that the estimation method can be used where the experimental method cannot be used for technical reasons. After careful consideration, we have concluded that performing a vapor pressure test with such a strong acid would very likely destroy the metal parts of the apparatus and therefore is not practical.

Environmental fate – As recommended, the robust summaries were revised to include the statement from the HPV Assessment report that no hydrolysable groups are present in BSA or p-toluenesulfonic acid.

Ecological effects – The test plan was revised to include a daphnia and an algae test, both of which will be performed.

Health Effects

- The literature was searched for studies investigating skin or eye irritation. We located a skin irritation study for p-toluenesulfonic acid indicating that the substance is corrosive and causes burns. As mentioned in the assessment report, p-toluenesulfonic acid is structurally very similar to BSA and has similar physicochemical, ecotoxicological and

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toxicological properties. A skin irritation study with BSA would be expected to show the same corrosivity. The ASAA appreciates the comments of EPA and the public recommending that we re-consider the need for a repeated dose study. Because of the corrosive nature of the substance, repeated dose and repro/developmental testing would not add significant information and will not be performed. Primarily local effects would be expected to be the critical effect. Moreover, a repeated dose study with p-toluenesulfonic acid has been performed and data can be read-across to BSA.

- The robust summary was revised to include acute clinical effects according to dose for p-toluenesulfonic acid. We reviewed the BSA acute article, but it provided no additional information and no reference to the original study; therefore, we were not able to report these details as suggested. Since we believe the read-across data from p-toluenesulfonic acid are relevant, we concluded that the data support our conclusions.

In preparing this test plan, the ASAA gave careful consideration to the principles contained in the letter EPA sent to all HPV Challenge Program participants on October 14, 1999. As requested by EPA, in that letter, the ASAA has sought to maximize the use of scientifically appropriate categories of related chemicals and of structure-activity relationships and to minimize the use of laboratory animals. Additionally, and also as requested by EPA's letter, the ASAA has conducted a thoughtful, qualitative analysis rather than use a rote checklist approach. The ASAA has taken the same thoughtful approach when developing this revised test plan.

If there are any questions regarding our test plan, please contact me at by e-mail at [william.smock@verizon.net](mailto:william.smock@verizon.net).

Sincerely,

William H. Smock  
Executive Director